



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 18, 2020

LANCE KOLBET, TREASURER  
FREEDOM FUND  
1201 PENNSYLVANIA AVENUE, SUITE 800  
WASHINGTON, DC 20004

**Response Due Date**  
**07/23/2020**

IDENTIFICATION NUMBER: C00390674

REFERENCE: YEAR-END REPORT (07/01/2019 - 12/31/2019)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must

FREEDOM FUND

Page 2 of 3

be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund, transfer to a non-federal account and/or reattribution) for each contribution. The committee should retain for its records copies of refund checks, transfers to nonfederal account, and/or letters reattributing the contributions in question. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

2. A review of the reports filed by your committee indicates that your committee received one or more contributions from "American Short Line & Reg. RR Asso PAC," "Employees of Northrop Grumman Corp PAC," "Loews Corporation Public Affairs Committee," and "Sazerac Company, INC. PAC" which have not been disclosed on their report(s) of receipts and disbursements. Please clarify if the contribution(s) was received from the disclosed donor's federal account and amend your report(s) if necessary.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit

FREEDOM FUND

Page 3 of 3

[www.fec.gov/help-candidates-and-committees](http://www.fec.gov/help-candidates-and-committees). For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit [www.fec.gov/help-candidates-and-committees/request-additional-information](http://www.fec.gov/help-candidates-and-committees/request-additional-information). Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1370.

Sincerely,

A handwritten signature in black ink that reads "Brian Wetzel". The signature is written in a cursive, flowing style.

Brian Wetzel  
Campaign Finance Analyst  
Reports Analysis Division

348

**Apparent Impermissible, Excessive, and Prohibited Contributions  
Freedom Fund (C00390674)**

**Apparent Excessive Contributions from Individuals**

| <b>Contributor Name</b> | <b>Date</b> | <b>Amount</b> | <b>Report</b> |
|-------------------------|-------------|---------------|---------------|
| Webb, Richard           | 1/10/19     | \$2,700.00    | 2019 Mid-Year |
| Webb, Richard           | 8/7/19      | \$1,400.00    | 2019 Year-End |
| Webb, Richard           | 8/7/19      | \$1,500.00    | 2019 Year-End |
| Webb, Richard           | 12/31/19    | \$2,100.00    | 2019 Year-End |